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12 **UNITED STATES DISTRICT COURT**

13 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
San Francisco Division
14

15 FEDERAL TRADE COMMISSION,

Case No. 14-CV-04785-EMC

16 Plaintiff,

**STIPULATED REQUEST AND PROPOSED
ORDER FOR EXTENSION OF FILING
DEADLINES FOR MOTION TO DISMISS,
OPPOSITION TO MOTION TO DISMISS,
AND REPLY IN SUPPORT OF MOTION
TO DISMISS, AND FOR SCHEDULING OF
HEARING AND INITIAL CASE
MANAGEMENT CONFERENCE**

17 v.

18 AT&T MOBILITY LLC, a limited liability
company,
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Defendant.

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25 Pursuant to Civil Local Rules 6-1, 6-2, and 7-12, defendant AT&T Mobility LLC
26 (“AT&T”) and plaintiff Federal Trade Commission (“FTC”) (collectively, the “Parties”) hereby
27 stipulate to an extension of the filing deadline governing AT&T’s motion to dismiss, and hereby
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1 file a stipulated request for a court order: (1) extending the deadlines governing (i) the FTC's
 2 opposition to AT&T's motion to dismiss and (ii) AT&T's reply in support of its motion to
 3 dismiss; and (2) scheduling an initial case management conference and a hearing on AT&T's
 4 motion to dismiss. The Parties require additional time to investigate all relevant issues and to
 5 submit their filings to the Court. The requested modifications will not affect the schedule for the
 6 case. The Parties therefore stipulate to the following schedule:

<u>Filing</u>	<u>Scheduled Due Date</u>	<u>Stipulated Due Date</u>
Motion To Dismiss	December 29, 2014. <i>See</i> Fed. R. Civ. P. 12(a)(1)(A)(ii).	January 5, 2015
Opposition to Motion To Dismiss	14 days after the motion to dismiss is filed. <i>See</i> Civil L.R. 7-3(a).	February 4, 2015
Reply in Support of Motion To Dismiss	7 days after the opposition is filed. <i>See</i> Civil L.R. 7-3(c).	February 18, 2015
<u>Proceeding</u>		<u>Stipulated Date</u>
Hearing on Motion To Dismiss		¹² March 5, 2015
Initial Case Management Conference		¹² March 5, 2015

17 Pursuant to Civil Local Rule 6-2, the reasons for the requested modification are set forth in
 18 a supporting declaration accompanying this request.

19 Pursuant to Civil Local Rule 5-1(i), I hereby attest that I have obtained concurrence in the
 20 filing of this document from all other signatories and that I have on file all holograph signatures
 21 for any signatures indicated by a "conformed" signature.

22 Respectfully submitted,

23 Dated: December 11, 2014 KELLOGG, HUBER, HANSEN, TODD,
 24 EVANS & FIGEL, P.L.L.C.

25 By: /s/ Michael K. Kellogg
 26 Michael K. Kellogg

27 Attorney for Defendant
 28 AT&T MOBILITY LLC

1 Dated: December 11, 2014

DAVID C. SHONKA
Acting General Counsel

2 By: /s/ Evan Rose
3 Evan Rose

4 Attorneys for Plaintiff
5 FEDERAL TRADE COMMISSION

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8 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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10 DATED: 12/12/14

